

Exhibit 4

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

DAWN DORLAND PERRY, et al.

Defendants.

Civil Action No.

1:19-cv-10203-IT

AFFIDAVIT OF SONYA LARSON
IN SUPPORT OF HER MOTION FOR LEAVE TO AMEND HER COMPLAINT

I, Sonya Larson, Plaintiff, Defendant in Counterclaim, on oath depose and state as follows:

1. I am a full-time author and writing professional. I currently work at GrubStreet, Inc., which is a 501(c)(3) non-profit center for creative writing, dedicated to building and serving the Boston writing community. I have worked at GrubStreet for over 14 years. My current duties include directing GrubStreet's national conference for writers, The Muse and the Marketplace, and organizing monthly events and myriad opportunities for the Boston Writers of Color Group.

2. In 2018, I entered a story I wrote called *The Kindest* in a competition conducted by the Boston Book Festival, Inc. (the "BBF"). I won the competition. My story was going to be used by the BBF in its One City/One Story project from August to October 2018, as part of its largest public event.

3. I am very familiar with the BBF and the One City/One Story project. I have attended many programs conducted by the BBF and have worked to promote and amplify several past programs involving past One City/One Story projects.

4. The 2018 Boston Book Festival was held in October 2018, and I am informed that it drew a record crowd. Unfortunately, my short story was not part of the Festival. According to Wikipedia (https://en.wikipedia.org/wiki/Boston_Book_Festival), the festival drew a record crowd. More than 275 authors were featured, and 30,000 people attended.


5. I personally know five past winners of the One City/One Story contests. Several past contest winners told me that the exposure of the One City/One Story program brought them extensive connections and conversations with new reading audiences; numerous new event invitations; new interviews for radio, print, and online media outlets; increased website traffic; increased mailing list sign-ups; connections that led to book deals; and connections that led to the sale of film rights.

6. Here are some of the benefits that past contest winners have enjoyed.

- Distribution in print of 30,000 copies of the story in English and Spanish, distributed to every branch of the Boston Public Library, the MBTA, and more than 40 bookstores, literary centers and shops, as well as online distribution in English and Spanish
- Translation of the story into Mandarin, Russian, Portuguese, Spanish, Haitian-Creole and French, to be posted online for downloading.
- Likely interviews and features on WBUR, the *Boston Globe*, the *Somerville Times*, and other media outlets that have typically featured the winning One City/One Story authors and stories in years past.
- Appearances and discussions at the Boston Book Festival.

- Likely 5-15 discussions about the work at Boston-area schools, colleges, library branches, community centers, and classrooms.
- Untold other opportunities brought about by new readership, including possible book deals and sale of film rights.
- Promotion of via the Boston Book Festival's press releases and social media feeds including Twitter.
- Appearances at numerous events in and around Boston

Signed under the pains and penalties of perjury this 14th day of July 2020.



Sonya Larson

Certificate of Service

I certify that Sonya Larson's Affidavit (1) In Opposition To the Motion for Judgment on the Pleadings By Cohen Business Law Group and Jeffrey A. Cohen, Esq., and (2) In Support Of Plaintiff's Motion For Leave To Amend Her Complaint was filed through the court's ECF system and a copy was sent electronically on the day it was filed to all counsel of record.

/s/ Andrew D. Epstein

July 15, 2020

Andrew D. Epstein